

Parties and counsel listed on signature pages

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**STIPULATION TO MODIFY
PROTECTIVE ORDER**

Pursuant to Civil Local Rule 7-12, the Parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court amend the Protective Order [586] to include a stipulated law enforcement sharing provision.

The Parties declare in support of this request:

1. Pursuant to Discovery Management Order No. 2 (ECF 606), the Parties negotiated and agreed upon a law enforcement sharing provision to amend the Protective Order [586].
2. The Parties agree on the following language:

Law Enforcement Purposes. The Plaintiff State Attorneys General may disclose the Meta Defendants' Protected Material to other State Attorneys General and United States federal government enforcement agencies that are investigating and/or prosecuting consumer protection claims against

Meta Defendants related to the allegations in any complaint filed by a State Attorney General against Meta Defendants that is or becomes included in this MDL, provided that those agencies agree in writing to be bound by the terms of this Order. The State Attorneys General and United States federal government enforcement agencies who receive the Meta Defendants' Protected Material pursuant to this paragraph may use it for investigating and/or litigating their consumer protection claims against Meta Defendants related to the allegations in any complaint filed by State Attorneys General against Meta Defendants that is or becomes included in this MDL. The Parties agree to meet and confer regarding amending this provision to apply to additional Defendants if a complaint filed by a State Attorney General that is or becomes included in this MDL names such Defendants.

3. The Parties agree that the aforementioned language shall be inserted into Protective Order [586] as section 7.1(a).

THEREFORE, pursuant to Civil Local Rule 7-12, the Parties stipulate and respectfully request that the Court amend the Protective Order [586].

IT IS SO STIPULATED AND AGREED.

DATED: March 1, 2024

Respectfully Submitted,

/s/ Lexi J. Hazam

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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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3 Dated: _____

4 MAGISTRATE JUDGE PETER H. KANG
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ATTESTATION

I, Thomas Huynh, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: March 1 2024

By: /s/ Thomas Huynh

Thomas Huynh
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